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DEC 20 1991

Federal Communications Commission
Office of the Secretary

December 20, 1991

Ms. Donna Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

Re: National Association of Regulatory Utility Commissioners' Petition for
Notice of Inquiry Addressing Administration of the North American
Numbering Plan, Undocketed

Dear Ms. Searcy,

Enclosed herewith for filing are the original and four (4) copies of MCI
Communications Corporation's Comments regarding the above captioned petition, in
accordance with the Commission's Public Notice dated October 18, 1991.

Please acknowledge receipt by affixing an appropriate notation on the copy of
the MCI Comments furnished for such purpose and remit same to the bearer.

Yours truly,

Carol Schultz
Its Attorney

RECEIVED

DEC 20 1991

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of:)
)
National Association of Regulatory)
Utility Commissioners' Petition for)
Notice of Inquiry Addressing) Undocketed
Administration of the North American)
Numbering Plan)

COMMENTS

MCI Communications Corporation (MCI) hereby submits its Comments in response to the Commission's Public Notice of October 18, 1991, on the National Association of Regulatory Utility Commissioners (NARUC) petition requesting that the Commission establish a Notice of Inquiry (NOI) to seek information regarding the administration of the North American Numbering Plan (NANP).

MCI applauds NARUC for its initiative in addressing critical numbering issues facing the communications industry; it strongly supports the NARUC petition and urges the Commission to open a NOI immediately. Below, MCI will briefly summarize the NARUC petition and expand upon the need for immediate Commission action. MCI will also discuss the need to address other issues vital to universal service, the future of telecommunications services and global competitiveness, which have not been expressly included in NARUC's Petition.

I. THE NARUC PETITION

In its petition, NARUC broadly outlines various numbering schemes that Bell Communications Research Corporation (Bellcore) administers.¹ It expresses the valid concern that valuable NANP resources, including NPAs and CIC codes, are rapidly being depleted, "causing the communications industry to spend untold millions of dollars to devise and eventually implement the chosen solutions." NARUC notes that the decisions currently being made will greatly affect ratepayers financially, result in customer confusion and impact quality of service. The choice among various solutions will also influence competition by promoting or favoring particular industry players and industry segments and/or technologies. Many state interests are thus impacted by these decisions, hence NARUC's particular interest.

NARUC also recognizes that numerous new codes for which administration will be necessary are being implemented or are in the planning stages, and that solutions to the NANP problems could impact new or existing services.² Finally, NARUC lists

¹ The following numbering codes administered by BellCore are cited by NARUC:

- 1 - Numbering Plan Area ("NPA") codes dialed by ratepayers;
- 2 - Automatic Number Identification Information (II) digits used in the processing of telephone calls;
- 3 - Carrier Identification Codes ("CIC") dialed by ratepayers to reach specific purchasers of access services;
- 4 - Telecommunications Credit Card Issuers Identification codes ("CIID") used in the routing of credit card calls;
- 5 - Interexchange Carrier Operator access codes;
- 6 - Service Access Code 800 central office codes;
- 7 - Service Access Code 900 central office codes; and
- 8 - Signaling point codes used as addresses in Signaling System 7 ("SS7") signaling messages

In addition to those codes cited by NARUC, BellCore also administers N11 codes and unassigned NOO codes.

² NARUC identifies the following new codes that will require administration:

- 1 - Intermediate Signaling Network Identifier ("ISNI") codes used to identify the SS7 signaling network required to carry some SS7 messages; (continued)

several issues it believes are crucial and which it would like the Commission to set forth for comment.³ NARUC requests that the Commission, in its capacity of resolving complaints or concerns regarding the NANP, to initiate a NOI.

II. THE URGENT NEED FOR COMMISSION ACTION

MCI agrees with NARUC that there is an urgent need to address NANP issues. Concerns relating to ratepayer rate levels, customer confusion, competition and state interests, cited by NARUC, are compelling reasons to institute a NOI. MCI wishes to

(footnote 2, continued)

2 - Number assignments for the Public Switched Digital Service ("PSDS") offerings;

3 - Number assignments for personal communications services ("PCS") e.g. numbers will be assigned to individuals rather than locations; and

4 - Number assignments and administration of the 800 Database pending approval by the FCC.

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These are:

1. The costs to the telephone companies and the ratepayers of creating and deploying a system of interchangeable NPA codes or any alternative plan to address the NPA code exhaust;
2. The costs that may be appropriately allocated to a telecommunications service that consumes a limited resource, such as a telephone number of CIC code, that will eventually cost many millions of dollars to replenish;
3. The effects a new numbering scheme may have upon the differing types of existing customer premises equipment and the dialing patterns familiar to ratepayers;
4. The potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services including PCSs;
5. The possible competitive advantage to the Regional Bell Operating Companies of having Bellcore as the NANP administrator;
6. The examination of equitable plans for assigning NANP codes among the competing interests such as the BOCs, the IOCs, the IXC's, the ESPs, Cellular Mobile carriers, and emerging PSC providers;
7. The examination of methods that may be used to reduce the demand for scarce NANP codes, or to augment the existing supply of telephone numbers, such as CO code-sharing and reclaiming unused telephone numbers, or some combination of the above;
8. The establishment of additional monitoring reports that could be used by regulators to exercise oversight, decide public policy, and inform the public;
9. The examination of technically feasible alternatives, available today or in the future to the plan developed in the 1960's for the exhaust of the current NPA coding scheme; and
10. The examination of any final proposal to assure that it includes an appropriate consideration of the independent telephone companies' switching equipment and reconfiguration costs.

emphasize that the NANP consists of limited and valuable public resources over which the Commission has jurisdiction.⁴ It was devised originally for monopoly provided voice service, and its administration was handled by AT&T prior to divestiture and by Bellcore after divestiture. Traditionally, AT&T delegated central office code administration to its Bell Operating Companies, a practice continued by Bellcore. Prior to the advent of global and domestic competition, few customers and services competed for NANP resources, and NANP administration may have worked well in general in the past.

However, given marketplace and other developments, the time has come to review the NANP and its administration.⁵ The introduction of competition has created a dramatically different environment. Today, numerous carriers offer a multitude of services to an expanding global customer base. NANP administration now has broader implications for public policy, including effects on the United States' ability to compete in global markets, domestic telecommunications competition, universal service, and the introduction of new telecommunications services. The existing administrative framework clearly is not designed to handle these emerging concerns. In fact, this critical public resource is still being administered by Bellcore, an entity which is completely owned by one segment of the industry, specifically, the Regional Bell Operating Companies

⁴ The Commission has appropriately recognized its plenary jurisdiction over numbering codes. See, e.g., Declaratory Ruling, In the Matter of The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, 2 FCC Rcd 2910, at 2911 fn. 12.

⁵ MCI uses "administration" broadly to include defining and deciding upon numbering schemes and dialing plans, as well as allocating and tracking the allocation of numbers among services, carriers and customers.

(RBOCs). This ownership attribute exacerbates the need for Commission intervention.

NARUC correctly recognizes that the pending exhaustion of a number of codes, including the NPA codes, CIC codes, and II codes urgently needs to be addressed. However, Bellcore has demonstrated a clear propensity to favor its owners when contention arises over limited resources. For example, early in 1991, Bellcore, allegedly based upon its forecasted demand for CIC codes, recommended to the industry that Phase I of CIC code expansion be delayed until 1994, and Phase II be postponed until 1997.⁶ Delay in the schedule was favored by the RBOCs because they could postpone investing capital to implement the expansion. Yet, less than a month later Bellcore approached the Commission asking that access purchasers be required to return CIC codes because of the shortage.⁷ This hardly demonstrates a neutral position. Further bias is evidenced by Bellcore's choosing to ignore its longstanding definition of "entity" in order to permit an assignment of a CIC code, in excess of the maximum number of allowable assignments, to itself and the RBOCs after conservation had been implemented.⁸

⁶ See, Carrier Identification Code (CIC) Expansion Update, Industry Carriers Compatibility Forum (ICCF) #22, March 20-21, 1991, presented by James N. Deak, Bellcore.

⁷ See, Letter from T.A. Saunders, P.E., Bellcore to Richard M. Firestone, Federal Communications Commission, dated April 10, 1991.

⁸ Conservation began in March of 1989. See, Letter from G. Gary Schlanger, NANP to CIC Distribution List, ICCF Participants, dated March 20, 1989, which included a copy of the "Guidelines For Interexchange Customers To Obtain A Carrier Identification Code (CIC) For Use With Feature Group B and/or D Access" (CIC Code Guidelines). According to the CIC Code Guidelines, each "entity" that had already been assigned a code was prohibited from additional code assignments, and each "entity" was limited to a maximum of three to four code assignments. CIC Code Guidelines, Section 3.0. Entity was defined as "a firm or group of firms under common ownership or control (i.e. parent and all subsidiaries operating autonomously within the same corporate (continued)

The exhaustion of NPA codes threatens the very ability to provision universal service. In fact, Bellcore stated in an industry forum that there is a possibility that the current NPA's may be exhausted before interchangeable codes are made available.⁹ Yet, Bellcore presently has no accepted industry guidelines for the assignment of NXX codes, a failing which directly contributes to the exhaustion of NPA codes.¹⁰ Thereby, the RBOCs have been able to assign NXX codes as they wish with no assurances to the industry that they are being used in an efficient manner. While giving the RBOCs a free reign in assigning NXXs, Bellcore plans to attempt to reclaim NPA codes already assigned to other industry segments, specifically, Canadian TWX, ISDN and the US Government.¹¹ Also, Bellcore has not yet issued its plan for the use and assignment of 640 "interchangeable NPA codes" which are critical to the advancement of the entire North American telecommunications industry and its users.

(footnote 8, continued)
family or under the same corporate umbrella.)" Id., Section 1.0. Bellcore and the RBOCs would clearly be defined as a single entity under this definition. However, Bellcore assigned itself an additional CIC code (number 34) after the beginning of conservation, when the RBOCs and Bellcore collectively had already been assigned at least five other codes. See, Letter from Lance S. Liptak, ICCF, to CIC Reclamation Subcommittee, dated May 23, 1991 and attachment listing new assignment to Bellcore, and Memorandum from Roy L. Morris, AllNet, to Tom Vandever, Bellcore, dated July 15, 1991, which delineates the codes already assigned to the collective "entity."

⁹ See, "Interchangeable NPA Update," (NPA Update) a presentation by R.R. Conners of Bellcore to the ICCF meeting number 24, held November 13-14, 1991, specifically, the page entitled "1991 COCUS Results."

¹⁰ See, Letter from Richard Firestone, Federal Communications Commission to Thomas A. Saunders, P.E., Bellcore, dated June 21, 1991.

¹¹ The NPA Update indicated that Bellcore anticipates that the three NPAs in the NO/1X format currently unassigned will be exhausted prior to the date for implementation of interchangeable NPAs. Thus, the only manner in which additional codes could be made available would be to reclaim the NPAs already assigned for other purposes.

Additionally, some of the new NANP resources could be reserved for other new services, but every indication is that Bellcore plans to reserve all codes for the RBOCs' exclusive use. When Bellcore was approached with a request by the interexchange carrier (IXC) industry for the allocation of future (i.e., interchangeable) NPAs for carrier-specific routing of inbound international calls, Bellcore refused, recommending its own alternative for handling such traffic, which was unworkable for the IXCs.¹² As justification for its refusal, Bellcore cited a number of unsubstantiated claims that a future NPA assignment would be subject to "abuse and misuse" and would violate the principles and long-term needs of the NPA.¹³

The Commission must understand the ramifications of the implementation of "interchangeable NPAs" or other solutions for NPA exhaustion, the pending expansion of CIC codes, and any other plans affecting NANP resources. The Commission should consider how these assets should be allocated and managed, after reviewing the needs of ratepayers, the states and all segments of the industry.

It is particularly critical that such decisions be made openly and in an unbiased manner. There are currently a number of planned new services that will need numbering plans and

¹² Bellcore's proposal ignored the IXCs' needs because it would not work in Canada, and was not in accordance with CCITT recommendations on international numbering and routing. Thus, the IXCs could not accept Bellcore's proposal. See, Letter from Dennis K. Thovson, Division manager, AT&T to Fred Gaechter, Bellcore, dated September 25, 1989, and Letter from Ken Eckel, MCI Telecommunications Corporation to Fred Gaechter, Bellcore, dated September 22, 1991, and Letter from Ron Havens, US Sprint to Fred Gaechter, Bellcore, dated September 25, 1991.

¹³ See, Letter from North American Numbering Plan Administrator to Telecommunications Entities Within the North American Numbering Plan Area, dated August 28, 1989.

resources, including ISDN and broadband ISDN, PCS, cellular and new mobile technologies, new computer based technologies, switched multimegabit data service (SMDS) and other broadband data technologies. In order to maintain their position as premier service providers, United States companies must continue to develop telecommunications services, features and functionalities that require additional numbering resources.

Numbering definition and allocation may affect which services may be offered by whom and in what markets. These matters are well within the purview of the Commission's responsibility under its mandate. 47 U.S.C. 151.

III. ADDITIONAL ISSUES SHOULD BE ADDRESSED IN A NOI

NARUC has provided a fairly comprehensive list of issues that need to be addressed in a NOI, and has structured its petition so that any numbering issue can be addressed.¹⁴ However, MCI submits that the following should be raised for comment:

1. Are there alternatives which may be superior to current NANP numbering schemes for new and existing services? (For example, some services could use either a current voice numbering scheme or a longer format. Others could be network identifiers or service identifiers in addition to geographically based numbers.)
2. What would be the probable effects of any new or modified telecommunications numbering plans on competition in telecommunications markets, both domestic and international (inbound and outbound)? (Effects on international competition should include a discussion of compliance with international standards.)
3. What should be the scheme of regulation, monitoring and administration, considering the limited nature of numbering resources? (Specific comments are needed on alternatives to Bellcore for assigning and administering the NANP.)

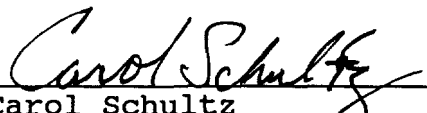
¹⁴ See, NARUC Petition, at 8.

IV. CONCLUSION

MCI respectfully requests that the Commission, in furtherance of the future public interest, immediately initiate a NOI to address how to best satisfy all customer and industry needs in the administration of NANP resources.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION


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Its Attorney

December 20, 1991

CERTIFICATE OF SERVICE

I, Linda Long, do hereby certify that a copy of the foregoing MCI Petition was sent via first class mail, postage paid, to the following on this 20th day of December, 1991:

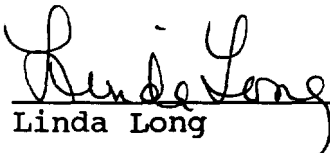
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